

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RACHAEL ANNE ELROD, ANDREW KAUFMAN, and SARAH MARTIN, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NO TAX 4 NASH, JIM ROBERTS, MICHELLE FOREMAN, KIMBERLY EDWARDS, and JOHN DOES 1-10,

Defendants.

No. 3:20-cv-00617

**District Judge Eli J. Richardson
Magistrate Judge Barbara D. Holmes**

CLASS ACTION

JURY TRIAL DEMANDED

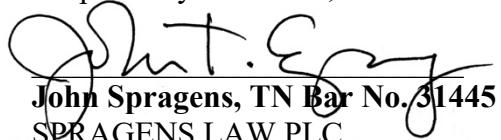
PLAINTIFFS' NOTICE OF PENDING MOTION TO CONSOLIDATE

Plaintiffs Rachael Anne Elrod, Andrew Kaufman, and Sarah Martin, individually and on behalf of all others similarly situated, file this Notice to inform the Court of a pending motion in a related action. Plaintiff in *Brasfield v. NoTax4Nash, et al.*, No. 3:20-cv-00618 (M.D. Tenn.), an action involving substantively identical factual and legal allegations as those in this case, filed an Unopposed Motion to Transfer and Consolidate requesting that *Brasfield* be transferred to this Court and consolidated with this, the first-filed action. *See* Ex. 1 (Motion and Memorandum of Law). As of today's date, no responses have been filed, and the motion remains pending.

Plaintiffs Elrod, Kaufman, and Martin do not oppose the *Brasfield* plaintiff's motion but wanted to notify the Court about the possibility of consolidation before the September 1, 2020 initial case management conference in this action.

Date: August 20, 2020

Respectfully submitted,



John Spragens, TN Bar No. 31445

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Attorneys for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Notice has been served via the Court's CM/ECF system upon:

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Attorney for Defendant Michelle Foreman

Notice has additionally been e-mailed to counsel for Defendant Kimberly Edwards, who has not yet appeared in this action.



John Spragens